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*Lead Counsel for Direct Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

Master File No. 07-CV-5944-JST

MDL No. 1917

### This Document Relates to:

*Crago, d/b/a Dash Computers, Inc., et al. v. Mitsubishi Electric Corporation, et al.*, Case No. 14-CV-2058-JST.

**DECLARATION OF STEVEN N. WILLIAMS  
IN SUPPORT OF DIRECT PURCHASER  
PLAINTIFFS' APPLICATION FOR  
ATTORNEYS' FEES AND EXPENSES AND  
INCENTIVE AWARDS**

Date: June 8, 2017

Time: 2:00 p.m.

Judge: Honorable Jon S. Tigar

Courtroom: 9

1 I, Steven N. Williams, declare:

2       1. I am a principal of Cotchett, Pitre & McCarthy, LLP, counsel for Direct Purchaser  
3 Plaintiffs (“DPPs” or “Plaintiffs”) in this action. I submit this declaration in support of DPPs’ joint  
4 Application for Attorneys’ Fees and Expenses and Incentive Awards (“Fees and Expense  
5 Application”) in connection with the services rendered in this litigation. I make this declaration  
6 based on my personal knowledge and if called as a witness, I could and would competently testify  
7 to the matters stated herein.

8       2. My firm has served as counsel for the Class throughout the course of this litigation.  
9 The background and experience of Cotchett, Pitre & McCarthy and its attorneys are summarized in  
10 the curriculum vitae attached hereto as **Exhibit A**.

11      3. Cotchett, Pitre & McCarthy, LLP has prosecuted this litigation solely on a  
12 contingent-fee basis, and has been at risk that it would not receive any compensation for  
13 prosecuting claims against the defendants. While Cotchett, Pitre & McCarthy, LLP devoted its time  
14 and resources to this matter, it has foregone other legal work for which it would have been  
15 compensated.

16      4. During the pendency of the litigation, Cotchett, Pitre & McCarthy, LLP performed  
17 the following work:

18       a. **Court Appearances and Preparation:** Cotchett, Pitre & McCarthy, LLP  
19 actively participated in court hearings, including Case Management Conferences, Preliminary  
20 Approval of Settlement, and Final Approval of Settlement. Cotchett, Pitre & McCarthy, LLP also  
21 took an active role in preparation for oral argument at these hearings.

22       b. **Discovery, Experts and Investigation:** Cotchett, Pitre & McCarthy, LLP  
23 contributed significant discovery and investigative work. Cotchett, Pitre & McCarthy, LLP  
24 actively participated in discovery meetings with Lead Counsel pertaining to depositions, discovery  
25 requests and responses, supplemental document productions, motion for a protective order, experts  
26 and project assignments.

27       Cotchett, Pitre & McCarthy, LLP conducted significant research into issues pertaining to  
28 re-deposing class representatives, and was instrumental in preparing class representatives for

1 depositions, as well as defending them at their depositions. Cotchett, Pitre & McCarthy, LLP  
2 further participated in key meetings with experts regarding markets, liability issues and damages.

3           c.     **Case Management:** Cotchett, Pitre & McCarthy, LLP attended weekly calls  
4 with Lead Counsel and the trial team to discuss pending issues, upcoming issues and action items.

5           d.     **Motion, Briefs and Legal Research:** Cotchett, Pitre & McCarthy, LLP  
6 performed extensive legal research and assisted in various motions and briefs during the case,  
7 including for issues pertaining to Sharp opt-out issues, Motion to Quash, Motion for Sanctions,  
8 Motion to Compel Documents, and Trial Scheduling.

9           e.     **Settlements:** Cotchett, Pitre & McCarthy, LLP was instrumental in  
10 mediations and settlement conferences. Along with lead counsel, Cotchett, Pitre & McCarthy, LLP  
11 extensively prepared for and participated in mediations and settlement discussions with Mitsubishi.  
12 Cotchett, Pitre & McCarthy, LLP assisted in the preparation of mediation statements and analysis  
13 of Mitsubishi's mediation statements. Cotchett, Pitre & McCarthy, LLP also had numerous  
14 settlement discussions with counsel for Mitsubishi

15           f.     **Trial Prep:** Cotchett, Pitre & McCarthy, LLP participated in trial team  
16 meetings and prepared trial planning materials for the trial team. Cotchett, Pitre & McCarthy, LLP  
17 also extensively worked with experts to prepare for trial.

18       5.     Attached hereto as **Exhibit B** is my firm's total hours and lodestar, computed at  
19 historical rates, from the inception of DPPs' case against the Mitsubishi Electric Defendants and  
20 the Thomson Defendants (Case No. 14-CV-2058-JST, filed May 5, 2014) through October 31,  
21 2016. The total number of hours spent by Cotchett, Pitre & McCarthy, LLP during this period of  
22 time was 505.9 hours, with a corresponding lodestar of \$347,567.50. This summary was prepared  
23 from contemporaneous, daily time records regularly prepared and maintained by Cotchett, Pitre &  
24 McCarthy, LLP. The lodestar amount reflected in Exhibit B is for work assigned by Lead Counsel,  
25 and was performed by professional staff at my law firm for the benefit of the DPP Class. None of  
26 these hours were included in connection with DPPs' first fee and expense application (ECF No.  
27 4055).

6. The hourly rates for the attorneys and professional support staff in my firm included in Exhibit B are the usual and customary hourly rates charged by Cotchett, Pitre & McCarthy, LLP.

7. Cotchett, Pitre & McCarthy, LLP has expended a total of \$2,130.69 in unreimbursed costs and expenses in connection with the prosecution of DPPs' case against the Mitsubishi Electric Defendants and the Thomson Defendants. These costs and expenses are broken down in the chart attached hereto as **Exhibit C**. They were incurred on behalf of DPPs by Cotchett, Pitre & McCarthy, LLP on a contingent basis and have not been reimbursed. The expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred. None of these expenses were included in connection with DPPs' first fee and expense application (ECF No. 4055).

8. I have reviewed the time and expenses reported by Cotchett, Pitre & McCarthy, LLP in this case which are included in this declaration, and I affirm that they are true and accurate.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 9, 2017 at Burlingame, California.

/s/ Steven N. Williams  
STEVEN N. WILLIAMS

## ATTESTATION

I, R. Alexander Saveri, hereby attest, pursuant to United States District Court, Northern District of California Civil Local Rule 5-1(i)(3), that concurrence to the filing of this document has been obtained from the signatory hereto.

By: /s/ R. Alexander Saveri  
R. Alexander Saveri

# **EXHIBIT A**

# **COTCHETT, PITRE & McCARTHY, LLP**

## **ATTORNEYS AT LAW**

BURLINGAME | LOS ANGELES | NEW YORK

WWW.CPMLEGAL.COM

## **FIRM RESUME**

### **WHO WE ARE**

Cotchett, Pitre & McCarthy, LLP based on the San Francisco Peninsula for over 45 years, engages exclusively in litigation and trials. The firm's dedication to prosecuting or defending socially just actions has earned it a national reputation. With offices in Burlingame, Los Angeles and New York, the core of the firm is its people and their dedication to principles of law, their work ethic and commitment to justice.

Most clients are referred by other lawyers, who know of the firm's abilities and reputation in the legal community. We are trial lawyers dedicated to achieving justice.

## WHAT WE DO

### ANTITRUST CASES

#### *In re Capacitors Antitrust Litigation*

#### **USDC, Northern District of California**

CPM is Lead Counsel and represents indirect purchasers of capacitors against defendants, the leading manufacturers of capacitors sold in the United States, for engaging in two massive and separate conspiracies to unlawfully inflate, fix, raise, maintain or artificially stabilize the prices of electrolytic and film capacitors, respectively.

CPM has extensively engaged in discovery, propounding and responding to numerous written discovery requests. CPM has also developed and implemented intricate document review procedures for purposes of defeating motions to dismiss and contesting summary judgment motions on limited time.

#### *In re Lithium Batteries Antitrust Litigation*

#### **USDC, Northern District of California**

The Court appointed CPM as Co-Lead Counsel on behalf of indirect purchasers of lithium-ion rechargeable batteries who allege that defendants conspired to fix the price of those products. CPM has been extensively involved in the review of millions of pages of documents, the production of plaintiffs' documents, propounding and responding to discovery, and depositions.

#### *In re Resistors Antitrust Litigation*

#### **USDC, Northern District of California**

The Court appointed CPM as sole Lead Counsel on behalf of a class of indirect purchaser plaintiffs of resistors purchased from defendants who allegedly conspired to unlawfully inflate, fix, raise, maintain or artificially stabilize prices.

#### *In re Static Random Access Memory (SRAM) Antitrust Litigation*

#### **USDC, Northern District of California**

The Court appointed CPM as sole Lead Counsel for direct purchaser plaintiffs of Static Random Access Memory ("SRAM") chips. CPM successfully secured a \$77 million settlement on behalf of plaintiffs. Important legal rulings were reached on cutting edge issues such as standing of class representatives and the proper showing for class certification. (Settled, 2011).

#### *In re Dynamic Random Access Memory (DRAM) Antitrust Litigation*

#### **USDC, Northern District of California**

CPM served as chair of the Discovery Committee in a multidistrict litigation arising from the price-fixing of DRAM, a form of computer memory. Shortly before the scheduled trial, class

counsel reached settlements with the last remaining defendants, bringing the total value of the class settlements to over \$325 million.

***In re Cathode Ray Tube (CRT) Antitrust Litigation***

**USDC, Northern District of California**

CPM is an Executive Committee Member and represents a class of direct purchaser plaintiffs against manufacturers of cathode ray terminals ("CRT") whose prices were artificially raised, maintained or stabilized at a supra-competitive level by defendants and their co-conspirators. Settlements amounting to \$139,450,000 have been reached in the case.

***In re Optical Disk Drive (ODD) Antitrust Litigation***

**USDC, Northern District of California**

CPM is a member of the executive committee in this multidistrict litigation alleging a conspiracy that manufacturers of optical disk drives ("ODD") fixed prices of ODDs sold directly to plaintiffs in the United States. Plaintiffs have reached \$74,750,000 in settlements.

***Auto Parts Antitrust Litigation***

**USDC, Eastern District of Michigan**

CPM is co-lead counsel on behalf of consumers against manufacturers of auto parts, alleging that defendants engaged in a conspiracy that lasted over a decade to fix the prices of automotive parts sold to automotive manufacturers such as Toyota, Honda, and Nissan. The case involves one of the largest conspiracies in history.

As co-lead counsel, CPM has heavily litigated and prevailed on many motions filed by defendants. CPM has been extensively involved in the document review process which entails millions of pages of documents requiring separate databases for each part at issue. CPM has also dedicated a significant amount of time and resources to proffers and mediations which has led to settlements with several defendants.

To date, CPM and its co-counsel have secured settlements on behalf of the class in excess of \$220 million.

***In re Generic Digoxin and Doxycycline Antitrust Litigation***

**USDC, Eastern District of Pennsylvania**

As a steering committee member, CPM represents plaintiffs who purchased generic doxycycline and/or generic digoxin from Defendants. Plaintiffs allege that defendants conspired to unlawfully raise the prices of generic doxycycline and generic digoxin to supracompetitive levels—thereby injuring Plaintiff and members of the Indirect Purchaser Classes.

***In re Broiler Chicken Antitrust Litigation***

**USDC, Northern District of Illinois**

CPM is co-lead counsel representing commercial and institutional indirect purchasers of Broilers (chickens) alleging that defendants conspired and combined to fix, raise, maintain, and stabilize the price of Broilers. Broilers constitute approximately 98% of all chicken meat sold in the United States. Defendants are the leading suppliers of Broilers in an industry with over \$30 billion in annual wholesale revenue.

***In re Domestic Airline Travel Antitrust Litigation***

**USDC, District of Columbia**

CPM is co-lead counsel representing plaintiffs against Defendants that illegally colluded to fix, raise, and maintain the price of domestic air passenger transportation through various means, including by eliminating or restricting the supply of domestic air transportation – otherwise known as seating “capacity.”

***In re Parking Heaters Antitrust Litigation***

**USDC, Eastern District of New York**

CPM serves as Liaison Counsel for indirect purchaser plaintiffs who purchased air and coolant parking heaters aftermarket for commercial vehicles from Defendants.

***In re International Air Transportation Surcharge Antitrust Litigation***

**USDC, Northern District of California**

CPM served as Co-Lead Counsel or a class of purchasers who paid fuel surcharges illegally charged by defendants on long-haul passenger flights for transatlantic routes. Plaintiffs secured settlements on behalf of the class with Defendants Virgin Atlantic Airways, LTD and British Airways Plc worth approximately \$204 million. (Settled, 2009).

***In re Transpacific Passenger Air Transportation Antitrust Litigation***

**USDC, Northern District of California**

CPM is the court-appointed Co-Lead counsel for a proposed class of purchasers who paid fuel surcharges illegally charged by defendants on long-haul passenger flights for transpacific routes. Throughout the course of this heavily litigated case, plaintiffs filed a comprehensive consolidated amended complaint detailing defendants' alleged violations. CPM defended and, on the whole, prevailed after two extensive rounds of hard-fought motions to dismiss, totaling 18 motions by Defendants with arguments covering such complex regulatory areas as the filed-rate doctrine, the act of state doctrine, the state action doctrine, implied preclusion, federal preemption and the sufficiency of the conspiracy allegations under *Twombly* and *Iqbal*, amongst several other attacks on the pleadings.

During the discovery phase of this litigation, CPM propounded several sets of discovery, organized a team of lawyers that reviewed, searched and extensively coded and analyzed several

million pages of documents – many of which were in foreign languages and required translations. CPM also engaged in extensive third-party discovery, including obtaining access to and reviewing the Airline Tariff Publishing Company’s (“ATPCO”) database for information concerning fares, itineraries, and other data pertinent to this litigation. CPM further attended several proffer sessions with Settling Defendants. Additionally CPM, prepared for and took, as well as coordinating co-counsel to assist with, depositions of 62 fact and 30(b)(6) witnesses from defendants and third-party witnesses, as well as defense of 15 class representative depositions. CPM also prepared for and defended the depositions of 3 expert witnesses regarding the filed-rate doctrine.

CPM engaged and consulted extensively with experts and economists on issues pertaining to electronic discovery, liability, summary judgment, class certification and damages throughout the course of the Action. Plaintiffs have reached settlements with several of the defendants. CPM also documented settlements with Settling Defendants, briefed motions for preliminary approval, and engaged experts noted in the field of class action notice for the purpose of developing a robust notice program to inform the Class regarding the pending settlements.

***Freight Forwarders Antitrust Litigation***

**USDC, Eastern District of New York**

CPM is Co-Lead Counsel for purchasers of Freight Forwarding services in the United States and filed a complaint alleging that the major providers of Freight Forwarding conspired to fix the prices of such services in violation of U.S. federal antitrust law (15 U.S.C. § 1). CPM was instrumental in securing approximately \$290 million in settlements with defendants for the benefit of the class.

During the course of the litigation, CPM with co-lead counsel, supervised class counsel, while zealously working to litigate complex international claims before any government indictments or guilty pleas or assistance from an Amnesty Applicant. CPM was instrumental in developing a consolidated class action complaint and defeating motions to dismiss. CPM, with co-lead counsel, reviewed millions of pages of documents and conducted numerous interviews of current and former employees of Settling Defendants. CPM also prepared for and took the depositions of several Defendants both domestically and internationally.

CPM played a critical role in responding to initial objections to the class settlement, through investigating legal issues raised by objectors and briefed a response that was filed by the Court, who agreed with our position and rejected the objections. CPM also established a mediation protocol which led to several settlements.

***Air Cargo Shipping Services Antitrust Litigation***

**USDC, Eastern District of New York**

CPM, along with co-counsel, was the court-appointed lead counsel for a proposed class of U.S. indirect purchasers of international air freight services. The case alleged that the providers of international air freight services conspired to fix the prices of such services, including fuel

surcharges. The case named almost forty international air freight carriers as defendants. The claims of the United States indirect purchasers were brought under the antitrust laws and consumer protection laws of various U.S. states. The Court granted approval to a settlement with defendants Deutsche Lufthansa AG, Lufthansa Cargo AG, and Swiss International Air Lines, Ltd. (Settled, 2009).

***In re Vehicle Carrier Services Antitrust Litigation***

**USDC, District of New Jersey**

CPM is co-lead counsel on behalf of consumers against Defendants, who are providers of Vehicle Carrier Services globally and in the United States, for engaging in at least a five yearlong conspiracy to fix, raise, maintain and/or stabilize prices and allocate the market and customers in the United States for Vehicle Carrier Services.

***In re Digital Music Antitrust Litigation***

**USDC, Southern District of New York**

CPM was appointed to the Steering Committee in this class action brought on behalf of all persons who paid inflated prices for music sold as digital files.

***In re: Plasma Derivative Protein Therapies Antitrust Litigation***

**USDC, Northern District of California**

CPM was lead counsel for indirect purchasers in this antitrust class action alleging price-fixing in the market for the life-saving blood products albumin and immunoglobulin.

***Webkinz Litigation, Nuts for Candy v. Ganz Inc., et al.***

**USDC, Northern District of California**

CPM was lead counsel representing a proposed class of persons or entities in the United States who ordered Webkinz from Ganz Inc. on the condition that they also order products from Ganz's "core line" of products. The complaint alleged that Ganz conditioned the purchase of its popular Webkinz plush line toy with a minimum \$1,000 purchase of non-Webkinz "core" line products in violation of federal antitrust laws. On September 17, 2012, Hon. Richard Seeborg of the Northern District of California approved a class action settlement on behalf of a class of small business retailers against Ganz Inc. for alleged antitrust violations where customers were required to purchase unwanted products as a condition to purchasing Ganz's popular Webkinz Toy. (Settled, 2012).

***In re Intel Corporation Microprocessor Antitrust Litigation***

**USDC, District Court of Delaware**

CPM represents entities against Intel Corporation for antitrust violations relating to monopolization. CPM was active in assisting lead counsel with discovery.

***Municipal Derivative Investment Antitrust Litigation***

**USDC, Southern District of New York**

Along with co-counsel, CPM represents Los Angeles and numerous public entities who purchased Guaranteed Investment Contracts (“GICs”) and other derivative investments. GICs and derivative investments are purchased from financial institutions, insurance companies, and others through a competitive bidding process overseen by brokers. They are purchased when public entities issue tax-exempt municipal bonds to raise funds to finance public works projects and have funds that are not immediately needed for the project. CPM’s investigation has uncovered, and the complaints allege, that the competitive bidding process is a sham as securities sellers and brokers in the derivative investment market have engaged in a conspiracy to allocate the market and rig the bidding process in violation of antitrust law and common law.

***Toyota Motor Sales USA, Inc.***

***Livingston v. Toyota Motor Sales USA, Inc.***

**USDC, Northern District of California**

CPM filed an antitrust class action under Sherman Act by purchasers of Toyota vehicles for secret rebates. (Settled, 1997).

***Hip And Knee Implant Marketing Litigation***

**USDC, Northern District of California**

CPM, with co-counsel, has filed two complaints on behalf of a proposed classes of persons who underwent hip or knee implant surgery. The complaints allege that the major manufacturers of hip and knee implants have engaged in a pervasive kickback scheme, using phony consulting agreements with orthopedic surgeons, to improperly funnel money to doctors and hospitals in return for choosing the manufacturer’s device during surgeries. This scheme artificially raised the costs of hip or knee implants paid for by members of the proposed class in violation of state antitrust and consumer protection laws.

***In re Commercial Tissue Products Public Entity Indirect Purchaser Antitrust Litigation***

***County of San Mateo v. Kimberly-Clark Corp.***

**San Francisco County Superior Court**

CPM filed an antitrust class action on behalf of class of public entity consumers of commercial sanitary paper products against alleged price-fixing conspiracy among producers. (Appointed co-lead counsel for public entity class, 1998).

***Dry Creek Corporation v. El Paso Corporation***

**San Diego County Superior Court**

CPM filed an antitrust action against El Paso for withholding natural gas from California in order to drive up prices, which was successfully resolved on behalf of the Plaintiff.

***In re Hydrogen Peroxide Antitrust Litigation***

**USDC, Eastern District of Pennsylvania**

CPM filed an antitrust class action for conspiracy to fix prices of hydrogen peroxide manufactured and sold by defendants who were engaged in an alleged price-fixing conspiracy.

***Kopies, Inc, et al. v. Eastman Kodak Co.***

**USDC, Northern District of California**

CPM was appointed Co-Lead counsel, and successfully prosecuted an antitrust class action on behalf of copier service firms against parts manufacturer for illegal tying of products and services. CPM successfully reached a \$45 million settlement with Kodak on behalf of plaintiffs.

***E&J Gallo Winery v. EnCana Energy Services, et al.***

**USDC, Eastern District of California**

CPM successfully represented E. & J. Gallo Winery in an antitrust action against natural gas companies for manipulating energy prices, which led to the 2000-2001 California energy crisis, in which energy companies not only gouged the State of California and its residents of billions of dollars but caused rolling blackouts throughout California. E. & J. Gallo Winery is one of the largest natural gas users in the State of California and it suffered millions of dollars in losses. CPM's aggressive prosecution of this case resulted in the case settling on the eve of. CPM's efforts led to the landmark Ninth Circuit opinion on the filed rate doctrine. *E. & J. Gallo Winery v. EnCana Corporation*, 503 F.3d 1027 (9th Cir. 2007).

***National Gas Anti-Trust Cases I, II, III, & IV***

**San Diego Superior Court**

CPM represented eleven public entities and others for the reporting of false information by non-core natural gas retailers to published price indices to manipulate the natural gas market during the California energy crisis. CPM successfully prosecuted this case, concluding in approximately \$124 Million in settlements.

***Bathroom Fittings Cases***

**USDC, Northern District of California**

CPM was a member of the Executive Committee in an antitrust class action for a conspiracy to fix prices of Bathroom Fittings manufactured by defendants participating in an alleged price-fixing conspiracy.

***Magazine Paper***

**San Francisco County Superior Court**

CPM filed an antitrust class action alleging a price-fixing conspiracy against magazine paper products International Paper Co., MeadWestvaco Corporation, Norse Skog, Stora Enso, Sappi Limited, S.D. Warren Company and others.

***Foundry Resins***

**USDC, Southern District of Ohio**

CPM filed an antitrust class action for conspiracy to fix prices of resins manufactured by Ashland Inc., Ashland Specialty Chemical Company, Borden Chemical Inc., Delta HA, Inc., HA International LLC.

***In re Automotive Refinishing Paint Cases***

**Alameda County Superior Court**

CPM was appointed Co-Liaison Counsel in an antitrust class action for conspiracy to fix the price of auto paint by manufacturers engaged in an alleged price-fixing conspiracy. The class was certified in 2004.

***In re Methionine Antitrust Litigation***

**USDC, Northern District of California**

CPM was appointed Co-Lead Counsel in this antitrust class action against several methionine manufacturers involved in a conspiracy to fix the prices of and allocate the markets for methionine. This case settled for \$107 million.

***In re Citric Acid Antitrust Litigation***

**USDC, Northern District of California**

CPM served as Co-Lead Counsel in an antitrust class action against the five largest sellers of citric acid in the United States, who conspired to raise and fix the price of citric acid at artificially high levels. Co -Lead counsel successfully certified the class in October 1996. Co-Lead Counsel also reached approximately \$86.5 million in combined settlements with defendants Archer Daniels Midland Co., Hoffmann-La Roche Inc., Jungbunzlauer, Inc., Haarmann & Reimer Corp., and Cerestar Bioproducts B.V.

***In re Beer Antitrust Litigation***

**USDC, Northern District of California**

CPM was appointed Co-Lead counsel in an antitrust class action on behalf of specialty beer brewers against Anheuser-Busch, Inc. for attempting to monopolize U.S. beer industry by denying access to distribution channels.

***In re Sodium Gluconate Antitrust Litigation***

**USDC, Northern District of California**

CPM served as Lead Counsel in an antitrust class action against defendants who allegedly price fixed sodium gluconate, and industrial cleaning agent. CPM successfully certified the class, and reached a settlement on behalf class plaintiffs in the amount of \$4,801,600.

## ANTITRUST ATTORNEYS AT CPM

### **PARTNERS**

#### **JOSEPH W. COTCHETT**

As stated by the National Law Journal, Joseph W. Cotchett is considered by plaintiffs and defense attorneys alike to be one of the foremost trial lawyers in the country. He has been named one of the 100 most influential lawyers in the nation for the past 15 years.

As reported in the San Francisco / Los Angeles Daily Journal, he is “considered one of the best trial strategists in the state” who built a career out of representing the underdog against powerful interests. He is a fearless litigator and once tried two cases at the same time (one in the morning and one in the afternoon) and won them both in San Diego Superior Court in 1984. His clients range from corporate giants to groups like Consumers Union of United States, Inc. In 2003, the San Francisco Chronicle said “*[t]he Burlingame attorney has had a star career that's not only talked about in legal circles but has made headlines around the country. Known mostly as a plaintiffs' lawyer, many of his cases are filed on behalf of fraud victims, and have a widows-and-orphan flavor to them.*” Cotchett consistently has been named one of the most influential lawyers in California, and has been named by the legal press as one of the top 10 trial attorneys in the state and has been listed in every edition of Best Lawyers in America since its inception.

During his 45-plus year legal career, he has tried more than 100 cases to verdict, and settled hundreds more, winning numerous jury verdicts, ranging from multi-million dollar malicious prosecution jury verdicts to several defense verdicts in complex civil cases. He successfully negotiated a multi-million dollar settlement in a qui tam suit on behalf of the University of California and hundreds of millions of dollars in antitrust, securities and major fraud cases.

In the 1980s, Cotchett won mammoth judgments and settlements for investors in white-collar fraud cases, with jury verdicts of more than \$200 million arising out of the collapse of the Technical Equities Corp. in San Jose. He is known nationally as the lead trial lawyer for 23,000 plaintiffs in the Lincoln Savings & Loan Association/American Continental Corp. downfall in 1990 involving Charles Keating and others. He won one of the then largest jury verdicts, \$3.3 billion. He obtained nearly \$300 million in settlements from lawyers, accountants and other professionals caught up in the scandal in a jury trial in Tucson, Arizona.

He has represented both the National Football League and teams since the early 1980s in various legal actions. As counsel for E. & J. Gallo Winery, he won a defense jury verdict in a celebrated trade dress infringement case involving a wine produced by Gallo and the firm regularly represents Gallo in numerous matters.

In recent years, Cotchett has taken on major corporate entities and Wall Street. He and the firm were involved in litigation resulting from nearly every major corporate scandal including Enron, Worldcom, Global Crossing, Homestore.com, Qwest, Montana Power Company, Lehman, Bank of America, Goldman Sachs, Lehman Brothers and numerous others on behalf of private investors and public pensions. The firm has represented the California Public Employees' Retirement System, California State Teachers' Retirement System, and the University Of California Board Of Regents, along with numerous political subdivisions of the state, such as counties, cities and districts.

In 2000, he served as trial counsel for Consumers Union, successfully defending the watchdog consumer group in a product disparagement and defamation suit. Isuzu Motors of Japan had sued Consumers Union for disparagement of the 1995-96 Trooper, claiming millions in damages. Following an eight-week trial, a jury ruled in favor of Consumers Union. Trial Lawyers for Public Justice honored Cotchett as "Trial Lawyer of the Year Finalist" in 2000 in honor of his "outstanding contribution to the public interest" through his work for Consumers Union. Also in 2000, Consumer Attorneys of California gave Cotchett its "Presidential Award of Merit"

Cotchett is involved in extensive pro bono work. In one such case, he brought a lawsuit against the United States Navy on behalf of 8,600 Amerasian children in the Philippines who were left in villages after the closing of the Subic Bay Naval Base. The case ended in a settlement giving direct U.S. aid to the children fathered by U.S. servicemen and a television documentary on the subject. He regularly takes on pro bono causes including environmental and public policy matters and the firm represents and advises several Native American groups.

In 2002, Cotchett successfully represented the Chief Justice of the California Supreme Court and the individual judges and members of the Judicial Council, in litigation brought against them by the New York Stock Exchange and the National Association of Securities Dealers. The two Wall Street forces had filed suit against the Judicial Council challenging the State of California for establishing guidelines for arbitrators who hear complaints from investors in the state.

Cotchett received his B.S. in Engineering from California State Polytechnic University, San Luis Obispo in June 1960, being named an Outstanding Graduate, and his J.D. from Hastings College of Law at the University of California in June 1964. In June 2002, Cotchett received an Honorary Doctor of Laws from Cal Poly and The California State University Board of Trustees. In May 2006, Cotchett received an Honorary Doctor of Letters from Notre Dame de Namur University. In May 2011, Cotchett received an Honorary Doctor of Letters from the University of San Francisco. In each case, he was the graduation speaker honored by the universities.

Following California Polytech, he served in the U.S. Army Intelligence Corps, followed by years as a Special Forces paratrooper and JAG Corps officer, in the active reserves, and retired in 1991 with the rank of Colonel. He is a member of many veteran and airborne

associations having served on active duty 1960-1961. From 2001 to 2005, he served on the board of the Army War College Foundation in Carlisle, Pennsylvania. The Foundation supports the prestigious Army War College at Carlisle Barracks, the graduate school for the senior commanders of all branches of the service, including officers from foreign allies.

He has been an active member of national, state and local bar associations, including the California, New York and District of Columbia bars. He is a Fellow of the prestigious American College of Trial Lawyers and The International Society of Barristers and an Advocate in the American Board of Trial Advocates. He also is a Fellow and former board member of The International Academy of Trial Lawyers. A former Master of the American Inns of Court, he serves on various advisory boards for professional organizations.

He also has served on the Advisory Board of the Witkin Institute, the mission of which is to further B.E. Witkin's commitment to advancing the understanding of California law and improving the administration of justice.

He is the author of numerous articles and a contributing author to numerous magazines. His books include California Products Liability Actions, Matthew Bender; California Courtroom Evidence, LexisNexis; Federal Courtroom Evidence, LexisNexis; Persuasive Opening Statements and Closing Arguments, California Continuing Education of the Bar (1988); The Ethics Gap, Parker & Son Publications (1991); California Courtroom Evidence Foundations, Parker Publications (1993); and numerous law review articles. He is a prolific author of op-ed pieces and articles on public policy, environmental issues and public integrity. In 2002, he co-authored and published the book The Coast Time Forgot, a historic guide to the San Mateo County coast.

Cotchett serves on the Federal Judicial Advisory Committee that submits and reviews federal judicial nominations in California to President Obama. The committee was authorized by the Obama Administration and California's two Democratic senators, Dianne Feinstein and Barbara Boxer. Cotchett is Chair of the Boxer Committee for the Central District of California (Los Angeles) and advises statewide. Cotchett also serves on a Judicial Advisory Committee to Governor Jerry Brown on state judicial appointments.

Cotchett has lectured at numerous law schools including Harvard Law School, the University of Southern California, Georgetown Law Center, Stanford, Boalt, and his alma mater U.C. Hastings. His subjects include complex cases, evidence, trial practice and professional ethics. He also is a keynote public speaker and lecturer on contemporary subjects of law.

He has been honored by the State Bar of California by serving on the Board of Governors from 1972 to 1975. Cotchett served on the California Judicial Council from 1976 to 1980; the Board of Directors, Hastings College of Law, University of California for twelve years; California Commission on the Future of the Courts; the California Select Committee on Judicial Retirement, the California Blue Ribbon Commission on Children in Foster Care, the latter three appointed by the Chief Justice of California.

His civic work includes past memberships on the board of directors of the San Mateo County Heart Association; San Mateo Boys & Girls Club (Past President); Peninsula Association of Retarded Children and Adults; Bay Meadows Foundation; Disability Rights Advocates; and numerous Bay Area organizations. He formerly served as a member of the board of Public Citizen in Washington, D.C. and served on the board of Earth Justice.

In 1996, he was awarded the Anti-Defamation League's Distinguished Jurisprudence Award. The award was established to recognize individuals in the legal community who have exhibited humanitarian concerns, and whose everyday actions exemplify the principals on which the Anti-Defamation League was founded.

In 1999, Cotchett was inducted by the State Bar of California to the Litigation Trial Lawyers Hall of Fame. This award is given to professionals who have excelled as trial lawyers and whose careers exemplify the highest values and professional accomplishment.

In 2000, the University Of California Hastings College Of Law opened the Cotchett Center for Advocacy recognizing Cotchett as one of its outstanding graduates. Chief Justice Ronald M. George of the California Supreme Court and Associate Justice Anthony Kennedy of the U.S. Supreme Court honored Cotchett as speakers at the Founder's Day dedication of the center. In November of 2006, Notre Dame de Namur University in Belmont, California dedicated the Joseph W. Cotchett Business Lab for students.

In March of 2000, Cotchett was named to the California State Parks Commission by Governor Gray Davis. The commission establishes general policies for the guidance of the Parks Department in the administration, protection and development of the 260 state parks in the system. He served as Chairperson in 2002-2003.

In 2003, Cotchett was honored by Disability Rights Advocates for his nearly 40 years of civil rights work. At a San Francisco dinner in October attended by lawyers, judges and community leaders, this was how Cotchett was described:

*Joe Cotchett has been a champion for justice since his college days. As an engineering student in North Carolina, Joe challenged segregation by drinking from segregated water fountains and riding in the back of buses. Later, as a student at Cal Poly, in 1958 Joe successfully established the first integrated fraternity, which prompted the other fraternities on campus to follow suit.*

*Joe's legal career has involved representing the underdog and doing extensive pro bono work. His civil rights commitment has been leveraged over and over by his financial support of legal fellowships. He has given a 'kick-start' to the public interest careers of the new law graduates at Trial Lawyers for Public Justice, Public Citizen, Southern Poverty Law Center and Disability Rights Advocates. Through these fellowships, Joe has helped to ensure social change through law.*

*Joe guided DRA as a board and litigation committee member from its infancy years into the defender of disability rights it has become today.*

In 2004, continuing a distinguished history of community and civic involvement, Cotchett endowed a \$7 million fund to support science and mathematics teacher education at California State Polytechnic University to serve inner city and rural minority children. To honor Cotchett, the university renamed its landmark Clock Tower building the “Cotchett Education Building.” The gift supports science and mathematics teacher education initiatives at Cal Poly through the University Center of Teacher Education and the College of Science and Mathematics.

In 2011, Cotchett was inducted into the prestigious American Trial Lawyer Hall of Fame for his work nationwide in civil rights, and litigation on behalf of the under-privileged in our society. In 2011, he received the Distinguished Service Award from the Judicial Council of California and was named the Antitrust Lawyer of the Year by the State Bar. In April of 2011, he was honored by the California League of Conservation Voters with the Environmental Leadership Award and honored by the Consumer Watchdog with the Lifetime Achievement Award.

Cotchett and his family members are active in numerous Bay Area charitable organizations involving animals, children, women and minorities. They established the Cotchett Family Foundation that aids individuals and groups in need of assistance.

### **STEVEN N. WILLIAMS**

Steven N. Williams joined Cotchett, Pitre & McCarthy in 1997 and became a partner of the firm in 2003. Williams practices exclusively in the fields of litigation, trial, and client counseling. Williams concentrates in the fields of antitrust, business disputes, constitutional law, environmental, securities, and consumer law.

Mr. Williams was named in the 2015 Global Competition Review as one of the top antitrust lawyers for plaintiffs in the nation.

#### Representative Clients:

Chief Justice of California Ronald George; California Judicial Council; residents of Avila Beach, California; residents of Santa Maria, California; residents of Burbank, California; California State Teachers' Retirement System; Regents of the University of California; Cambria Community Services District; Consumers Union of United States, Inc.; United Farm Workers; Dolores Huerta; City of Oakland, California; E. & J. Gallo Winery; borrowers from Ameriquest (class action); purchasers of iPods (class action); purchasers of air transportation between UK and US (class action); purchasers of flash memory products (class action); purchasers of SRAM memory products (class action); purchasers of Kodak copier equipment and parts (class action);

purchasers of automotive parts (class action); purchasers of lithium ion batteries (class action); purchases of capacitors (class action); purchasers of resistors (class action).

Representative Matters:

- Represents as co-lead counsel End-Payor Plaintiffs against several auto companies in separate class actions whose various auto parts prices were artificially raised, maintained or stabilized at a supra-competitive level by defendants and their co-conspirators.
- Represented (as lead counsel) class alleging antitrust violations in the market for passenger air transportation between the US and the UK. This action led to a settlement valued at over \$200 million for passengers overcharged by a price-fixing conspiracy involving air travel between the US and London, England.
- Represents (as lead counsel) class alleging antitrust violations in the market for worldwide passenger air transportation into and out of seven Asian nations.
- Represents purchasers on behalf of businesses and consumers of freight forwarding and logistic services alleging a world-wide conspiracy to fix prices for the shipment of goods.
- Represented (as lead counsel) class alleging antitrust violations in the market for SRAM. This action recovered overcharges to a nationwide class of consumers of SRAM memory chips, which were subject to concerted price-fixing by their manufacturers.
- Represented (as lead counsel) class alleging antitrust violations in the market for Flash memory. This action, similar to the SRAM action, sought to recover overcharges to a nationwide class of consumers of flash memory, such as memory sticks and cards routinely used to store and transfer data.
- Represents (as lead counsel) indirect purchasers in a complaint against several semiconductor companies for allegedly price fixing lithium ion batteries.
- Represents (as lead counsel) indirect purchasers in a complaint against several semiconductor companies for allegedly price fixing capacitors.
- Represents (as lead counsel) indirect purchasers in a complaint against several semiconductor companies for allegedly price fixing resistors.
- Represents direct purchasers in a complaint against several semiconductor companies for allegedly price fixing optical disk drive products.
- Represents direct purchasers in a complaint against several semiconductor companies for allegedly price fixing cathode ray tubes.

- Represented Chief Justice George, California Judicial Council, and its members in action brought by New York Stock Exchange and NASDAQ challenging California's Ethics Rules for Neutral Arbitrators. The New York Stock Exchange and NASDAQ alleged that California's Ethics Rules for Neutral Arbitrators were preempted by federal law.
- Represented California State Teachers' Retirement System in separate actions recovering losses suffered due to securities fraud by AOL/Time Warner and Qwest. In these actions, California's public school teachers recovered over \$150 million in losses to their pension and retirement funds.
- Represented City of Oakland, California in defense of anti-predatory lending ordinance challenged by American Financial Services Association on preemption grounds. In this action, lobbyists for the banking industry challenged an ordinance passed by the City of Oakland to regulate certain predatory lending practices that were believed to cause damage to the City of Oakland and its residents. Successfully defended the ordinance at both the trial court level, and in a unanimous decision of the Court of Appeals. Ultimately, in a 4-3 decision (with the majority opinion written by Justice Janice Rogers Brown, the decision of the Court of Appeals was reversed. Chief Justice George wrote a dissent expressing his view that the ordinance was not preempted.
- Represented residents of Avila Beach, California in action to redress damage caused by pollution throughout Avila Beach. In this action, Union Oil Company of California had permitted over 400,000 gallons of refined petroleum products beneath the small seaside town of Avila Beach. The action led to the complete remediation and restoration of the town.
- Represented Consumers Union of United States, Inc. (publisher of Consumer Reports) in defense of defamation/product disparagement actions brought by Suzuki, Isuzu, and Sharper Image. In each of these actions, the manufacturers sought to silence Consumers Union and inhibit its free speech right to warn consumers of dangerous and ineffective products. In each action, Consumers Union's free speech rights were vindicated. Williams accomplishments in the Suzuki and Isuzu cases resulted in being a Trial Lawyers for Public Justice Trial Lawyer of the Year Finalist in 2000.
- Represented residents of Santa Maria, California, whose community was devastated as a result of oilfield pollution left behind by numerous multinational oil companies, including Unocal, Chevron, ConocoPhillips, and Kerr-McGee. These actions have enabled residents to move to new homes, leaving behind their polluted neighborhood.
- Represented Cambria Community Services District, the sole water provider for the small coastside town of Cambria, in an action against Chevron to recover damages for harm

caused when community water supplies were polluted with MTBE. The recovery permitted Cambria to provide replacement water for the community.

- Represented class of mortgage borrowers from Ameriquest challenging Ameriquest's business practices. In this action we were successful in uncovering Ameriquest's mortgage scheme which was based upon intentionally placing borrowers in mortgages that Ameriquest knew they could not afford. Class wide relief was obtained, including business practice changes.

Williams received his undergraduate degree from New York University and his J.D. from Fordham University School of Law. He is admitted to practice before the State and Federal Courts of California, New York, and New Jersey and the United States Supreme Court. He has written and lectured on various topics including antitrust law and trial practice, electronic discovery, MTBE litigation, regulatory developments in environmental law, contractual issues in environmental cleanups, and habeas corpus.

Williams was appointed by Consumer Attorneys of California as member of California Discovery Subcommittee for revision of California discovery rules and statutes relating to electronic discovery and electronically stored information, 2007-2008. Williams gives yearly lectures to CAOC on topic of civil discovery in California.

#### **ADAM J. ZAPALA**

Adam J. Zapala focuses on antitrust, false claims act litigation, consumer protection and class actions generally. Mr. Zapala was named a Super Lawyer Rising Star in 2014 and 2015.

Mr. Zapala received a B.A. from Stanford University and his J.D. from University of California, Hastings College of the Law. While at Hastings, Mr. Zapala received awards for best moot court brief, the Pro Bono Publico award, most outstanding student in Group Advocacy and Systemic Reform, and Excellence for the Future Award in Pre-trial Practice.

Previously, Mr. Zapala worked at Davis, Cowell & Bowe, LLP. in San Francisco, where he represented labor unions, Taft-Hartley Pension and Health & Welfare funds, employees and consumers in complex litigation, arbitration and NLRB proceedings. While at DCB, Mr. Zapala served as trial counsel in countless arbitrations on behalf of labor unions and employee benefit funds. He has argued cases before the California First, Third, and Sixth District Court of Appeal.

Mr. Zapala also previously served as a staff attorney with Bay Area Legal Aid, where he focused on representing indigent clients in a wide variety of civil litigation matters. While there, Mr. Zapala developed expertise in Medi-Cal, Medicare and other publicly-financed healthcare systems. While in law school, Mr. Zapala also worked for the public interest law firms of Public Advocates, Inc. and Public Justice, focusing on civil rights class action litigation.

Mr. Zapala also has legislative and policy experience, working on Capitol Hill as a policy aide for Senator Ron Wyden (D-Oregon) in Washington D.C.

Mr. Zapala has deep ties to the Bay Area. He grew up in San Jose, California and attended Bellarmine College Preparatory. While at Stanford University, Mr. Zapala became a four-time Academic All-American, a four-time All-American, and Captain of the Stanford Men's Soccer Team. In 2001, he was drafted in the Major League Soccer ("MLS") Super Draft by the Dallas Burn (now FC Dallas).

### ***SENIOR ASSOCIATES***

#### **DEMETRIUS X. LAMBRINOS**

Demetrius Lambrinos focuses his practice on antitrust, complex class actions, qui tam cases and complex commercial litigation.

Mr. Lambrinos received his Bachelor of Art in Philosophy from the University of Redlands Johnston College. He received his J.D. from University of Iowa College of Law.

Mr. Lambrinos is a committed member of the Bay Area's nonprofit community. He currently sits on the board of the Bay Area Urban Debate League ("BAUDL"), a nonprofit that mentors underserved Bay Area high school students in the art of debate. As a board member, he has helped raised over \$240,000 from Bay Area law firms to further this mission. He has also spent many hours mentoring students and has been intimately involved with crafting the organization's strategic vision.

#### **ALEXANDER BARNETT**

Alex Barnett specializes in class actions involving: antitrust and securities law violations; consumer fraud; negligent product design and manufacture; wage and overtime disputes; civil rights violations; and violation of environmental laws. He also handles mass tort litigation.

Representative class action cases include: Turner v. General Electric Company, No. 2:05-CV-186-FtM-33DNF (M.D. Fla.) (claims by purchasers of allegedly defective General Electric refrigerators); Staton v. IMI South, LLC, No. 03-CI-588 (Ky. Cir. Ct.) (claims by purchasers of defective concrete for repair of home foundations and flatwork); In re Bridgestone/Firestone Inc., ATX, ATX II and Wilderness Tires, MDL No. 1373 (S.D. Ind.) (claims by purchasers of allegedly defective tires), Gori v. Merck & Co., Inc., No.: 04L1254 (claims by purchasers of Vioxx for refund of purchase price); and Harman v. Lipari (claims for medical monitoring for residents of neighborhood bordering a Superfund site in New Jersey). Mr. Barnett also has represented individuals injured by pharmaceutical products such as Redux

and Pondimin, Baycol, Serzone, and Vioxx. In addition, Mr. Barnett served as counsel for the cities of Boston, Los Angeles, Philadelphia and San Francisco against the handgun industry and as counsel for the City of Milwaukee in a case against the lead pigment industry.

Mr. Barnett has served as a lecturer on class actions, serving as a Panel speaker at the First Annual National Class Actions Symposium (Osgoode Hall Law School, Toronto, Canada) and the Third Annual Class Actions for Non-Class-Action Lawyers - Growing Your Business by Understanding the Basics and Recognizing Opportunities.

Prior to entering private practice, Mr. Barnett served as the Executive Director of the International Association of Jewish Lawyers and Jurists ("IAJLJ"), American Section, an organization dedicated to promoting human rights and the rule of law.

Before his tenure at the IAJLJ, Mr. Barnett served as the Democratic Party nominee for the New York State Assembly in New York's 17th Assembly District.

## ***ASSOCIATES***

### **ELIZABETH TRAN**

Elizabeth Tran focuses her practice on antitrust law and complex litigation. Ms. Tran was granted the American Antitrust Institute 2016 Outstanding Antitrust Litigation Achievement by a Young Lawyer Award. She was also named a Super Lawyers Rising Star in 2015 and 2016.

Ms. Tran received her B.A. in Economics and Political Science, with a concentration in Public Policy, from Boston University. At BU, she interned and studied abroad in London and Sydney during her third year.

Ms. Tran received her J.D. from the University of California, Hastings College of the Law. At UC Hastings, she was a super-regional semifinalist in the Jessup International Law Moot Court Competition. She also received honorable mentions for both best brief and best oral advocacy in Moot Court. Ms. Tran served as a judicial extern for the Honorable A. James Robertson II in San Francisco Superior Court and as a teaching assistant for both Legal Writing & Research and Moot Court. She studied international business law at Bocconi University in Milan for a semester.

In law school, Ms. Tran mentored underserved high school students on preparing for college. While awaiting bar results, she served as a graduate fellow at Bay Area Legal Aid, where she advocated for the rights of disadvantaged people to health and disability benefits. Ms. Tran has national and state legislative experience. She interned for U.S. Representative Neil Abercrombie (D-Hawaii; now Governor of Hawaii) in Washington, D.C. and State Representative Scott Nishimoto (D-Hawaii) in Honolulu.

## **JOYCE CHANG**

Joyce Chang focuses her practice on antitrust law and complex litigation.

Ms. Chang received her J.D. from Santa Clara University School of Law. At Santa Clara Law, Ms. Chang served as an editor on multiple Journals, including the Santa Clara Law Review and the Santa Clara Journal of International Law. She received honorable mentions for both year-end comments, won the Best Brief Award for appellate advocacy, and served as a mentor for incoming women law students.

During law school, Ms. Chang interned for the Honorable Judge Socrates Manoukian of Santa Clara County Superior Court. Additionally, she served as a volunteer translator at a local non-profit dedicated towards providing basic legal rights to Asian immigrants.

Prior to law school, Ms. Chang received her B.S. in Pre-medicine from the University of California at Davis. Between her studies, she volunteered for the UC Davis Medical Center. UCD recognized her work with the Community Service Award every year she was in college.

## **MARK RAM**

Mark Ram is an associate at Cotchett, Pitre & McCarthy, LLP. He focuses his practice on antitrust law and complex litigation.

Mr. Ram received his B.A. from Haverford College and his J.D. from the University of California, Hastings College of the Law. At Hastings, Mr. Ram served as an editor for the Hastings Law Journal and was a teaching assistant for legal writing and research. He received awards for best moot court oral argument and best performance in Complex Litigation. He also received the CALI/Witkin Award for Excellence in Complex Litigation

Following law school, Mr. Ram had the unique opportunity to clerk for two judges in the San Francisco Superior Court's Complex Litigation Department, Hon. Mary E. Wiss and Hon. John E. Munter (Ret.). Prior to joining Cotchett, Pitre & McCarthy, LLP, Mr. Ram practiced with a national firm in San Francisco focusing on class actions and products liability cases.

# **EXHIBIT B**

**EXHIBIT B**

In re Cathode Ray Tube (CRT) Antitrust Litigation  
**COTCHETT, PITRE & McCARTHY, LLP**  
 Reported Hours and Lodestar  
 Inception through October 31, 2016 - Mitsubishi/Thomson Only

**TIME REPORT**

NAME	TOTAL HOURS	HISTORICAL HOURLY RATE	LODESTAR
ATTORNEYS			
Cotchett, Joseph W. (P)	187.30	\$950	\$177,935.00
Cotchett, Joseph W. (P)	4.00	\$900	\$3,600.00
Williams, Steven N. (P)	113.10	\$850	\$96,135.00
Williams, Steven N. (P)	9.50	\$700	\$6,650.00
Zapala, Adam J. (P)	9.00	\$750	\$6,750.00
Tran, Elizabeth (A)	9.20	\$600	\$5,520.00
Chang, Joyce (A)	35.30	\$400	\$14,120.00
Chang, Joyce (A)	2.30	\$375	\$862.50
NON-ATTORNEYS			
Verducci, Jaclyn (PL)	74.60	\$325	\$24,245.00
Verducci, Jaclyn (PL)	10.60	\$250	\$2,650.00
Garcia, Lasha (PL)	3.10	\$225	\$697.50
Goldwyn, Priya (PL)	2.80	\$250	\$700.00
Quackenbush, Kyle (PL)	12.50	\$225	\$2,812.50
Peixoto, Gabriel (LC)	32.60	\$150	\$4,890.00
<b>TOTAL:</b>		<b>505.90</b>	<b>\$347,567.50</b>

(P) Partner  
 (OC) Of Counsel  
 (A) Associate  
 (PL) Paralegal  
 (LC) Law Clerk

# **EXHIBIT C**

**EXHIBIT C**

In re Cathode Ray Tube (CRT) Antitrust Litigation

**COTCHETT, PITRE & McCARTHY, LLP**

Reported Expenses Incurred on Behalf of DPPs - Mitsubishi/Thomson Only

**EXPENSE REPORT**

CATEGORY	AMOUNT INCURRED
Court Fees (Filing, etc.)	
Experts/Consultants	
Federal Express	144.03
Transcripts (Hearing, Deposition, etc.)	
Messenger Delivery	
Photocopies – In House (capped at \$0.20 per copy)	1,924.60
Photocopies – Outside	
Postage	
Service of Process	
Telephone/Telecopier	62.06
<b>TOTAL:</b>	<b>\$2,130.69</b>